

F I L E D  
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# United States District Court

Eastern Judicial District of Michigan

United States of America,  
v.

## CRIMINAL COMPLAINT

CASE NUMBER: 08-30179

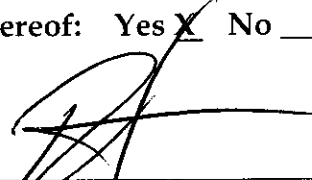
Gunawan WIBISONO,  
D.O.B xx/xx/1977  
Dyana SULISTYAWATI,  
D.O.B xx/xx/1979

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 12, 2008 in Wayne County, in the Eastern Judicial District of Michigan, defendant(s) did

knowingly fail to report the transportation of over \$10,000 in currency or monetary instruments out of the United States to a foreign country (failure to report) and knowingly conceal or cause to be concealed more than \$10,000 in currency or monetary instruments while attempting to transport it out of the United States to a foreign country for the purposes of avoiding the reporting requirements,

In violation of Title 31 United States Code, Sections 5316 and 5332(a)(1)(2), state that I am a Special Agent for Immigration and Customs Enforcement (ICE), and that this complaint is based on the following facts on the attached affidavit.

Continued on the attached sheet and made a part hereof: Yes ☒ No ☐

  
Signature of Complainant  
Jason Brumley  
Special Agent, ICE

Sworn to before me and subscribed in my presence,

Detroit, Michigan

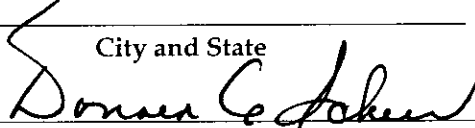
April 12, 2008  
Date

at

City and State

U.S. Magistrate Judge Donald A. Scheer

Name & Title of Judicial Officer

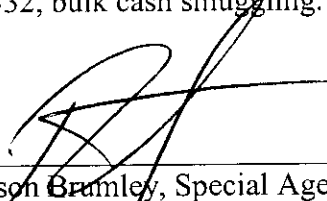
  
Signature of Judicial Officer

**AFFIDAVIT**

I, Jason Brumley, being duly sworn, depose and state the following:

1. I am a Special Agent with the United States Bureau of Immigration and Customs Enforcement (ICE), within the United States Department of Homeland Security. I am assigned to the Office of Investigations branch of the Resident Agent in Charge Office, located at 2596 World Gateway Place, Detroit MI. I have served with U.S. Immigration and Customs Enforcement since September 11, 2005. I have successfully completed the Criminal Investigator Training Program, the Immigration and Customs Enforcement Special Agent Training Program, and the Customs Inspector Basic School at the Federal Law Enforcement Training Center in Glynco, Georgia. Previously I earned an honorable discharge from the United States Army after serving from May 26, 1992 to February 9, 2001 in the Infantry. I also served as a United States Customs Inspector, in Detroit Michigan from June 17, 2002 to September 11, 2005. My current duties include the investigating violations of 31 USC 5316 ( failure to declare monetary instruments totaling \$ 10,000 or more outbound), and 31 USC 5332( bulk cash smuggling).
2. This affidavit contains information necessary to support a finding of probable cause. It is not intended to include each and every fact known by the affiant or the government.
3. On April 12, 2008, The United States Customs and Border Protection (CBP) Outbound Team was conducting outbound operations on Northwest Airlines flight # 25 at the Detroit Metro Airport. CBP Officers selected Gunawan WIBISONO (DOB: 07/07/1977), and his wife Dyana SULISTYAWATI (DOB: 05/16/1979) for an outbound currency examination. CBP Officers explained the currency reporting requirements to the couple. WIBISONO stated he understood the requirements and completed a written declaration for \$1,200. SULISTYAWATI stated she understood the requirements and completed a written declaration for \$2,700. CBP Officers searched SULISTYAWATI's purse and discovered a package wrapped in black paper inside of a black sock. SULISTYAWATI stated to the Officers it was a bundle of \$10,000 and that the money belonged to her husband. WIBONSO presented \$1200 to the Officers and admitted the bundle of money in his wife's purse was his. CBP Officers conducted a pat-down search of the couple with negative results. CBP Officers presented WIBISONO with a FINCEN 105 allowing him to amend their currency declaration. WIBISONO read and completed the form declaring the couple had \$12,000.

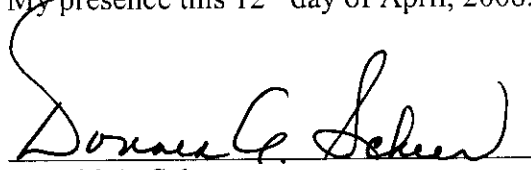
4. Upon the completion of the FINCEN 105 Officers examination of the carry-on baggage was resumed. WIBISONO's carry-on bags were searched and \$20,000 (two packages of \$10,000 each) was found concealed inside of a purse, placed inside a pair of black tights, and wrapped with black paper. Both packages also had two \$20 bills on the top and bottom of the taped \$10,000. A search of his other carry-on bag revealed seven more packages, each of \$10,000 were concealed like the others. A total of \$104,000 was found and seized for filing a false report on a FINCEN 105 form. CBP contacted Immigration and Customs Enforcement (ICE) Special Agent Jason Brumley.
5. Your affiant responded with Task Force Agent (TFA) Marc Gaynier to interview. WIBISONO completed a form stating he was read and understood his Miranda rights. WIBISONO stated he was responsible for concealing the currency inside his carry on luggage. WIBISONO stated he concealed the currency to avoid reporting it to United States Customs Officers. WIBISONO completed a sworn statement admitting to such.
6. Your affiant along with TFA Gaynier interviewed SULISTYAWATI who completed a form stating she was read and understood her rights. SULISTYAWATI stated she helped her husband conceal the funds inside the luggage. She further stated this was done to conceal the funds from United States Customs Officers. She completed a sworn statement admitting to such.
7. Based upon my training, experience and the foregoing information there is probable cause to believe Gunawan WIBISONO, and Dyana SULISTYAWATI are in violation of 31 USC 5316, failure to declare currency, and 31 USC 5332, bulk cash smuggling.



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Jason Brumley, Special Agent  
U.S. Department of Homeland Security  
Immigration and Customs Enforcement

Sworn to before me and subscribed to in  
My presence this 12<sup>th</sup> day of April, 2008.



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Donald A. Scheer  
U.S Magistrate Judge